



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JUN 05 2012

Ref: 8EPR-N

Thomas Malecek, District Ranger
Divide Ranger District
Rio Grande National Forest
13308 West Highway 160
Del Norte, CO 81132

RE: Black Mesa Vegetation Management Project Draft
Environmental Impact Statement, CEQ #20120126

Dear Mr. Malecek:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the April 2012 Draft Environmental Impact Statement (EIS) for the Black Mesa Vegetation Management Project. This Draft EIS was prepared by the Divide Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Rio Grande National Forest to analyze potential environmental impacts associated with salvaging timber stands being killed by spruce beetle, implementing fuel reduction treatments in Wildland-Urban Interface (WUI) areas, and managing hazard trees that may impact infrastructure in the Black Mesa project area.

The Black Mesa Project Area is located within Hinsdale and Mineral Counties and is approximately 15 miles west of the town of Creede, Colorado. The project area includes approximately 49,046 total acres. It includes several private in-holdings and is bordered to the south by the Weminuche Wilderness Area.

A summary of the three alternatives analyzed in the Draft EIS is as follows:

- Alternative 1 (No Action) – no vegetation or fuels management actions;
- Alternative 2 (Preferred Alternative) – salvage and regenerate approximately 9,410 acres of beetle infested Engelmann spruce stands; hand plant approximately 1,740 acres in areas not meeting desired forest levels following treatment; relocate 2 miles of road, construct 3.6 miles of new temporary road, and maintain 5.4 miles of old non-system roads from previous harvests; implement hazard tree removal near open roads, fences, private land, cabins or other infrastructure; and implement fuel reduction treatments on approximately 436 acres in WUI areas;

- Alternative 3 (Limited Action) – salvage harvest approximately 6,587 acres; hand plant approximately 995 acres; construct 0.9 miles of new temporary road and maintain 4.4 miles of old non-system roads; hazard tree removal and fuel reduction treatments would be the same as Alternative 2.

In a May 9, 2011 letter, the EPA provided scoping comments for this project. We appreciate that the USFS addressed many of our comments in the Draft EIS. As a result, our concerns with the April 2012 Draft EIS have been narrowed to these issues: (1) aquatic resources and (2) air quality. These concerns are the basis for the EPA's EC-2 rating discussed at the conclusion of this letter.

1) Aquatic resources in the project area are important and require evaluation and mitigation of associated impacts.

The EPA considers protection of aquatic resources to be among the most critical issues to be addressed in any NEPA analysis for vegetation management activities. Most treatments contemplated under the proposed action (e.g., harvest, fuel reduction, hazard removal and road construction) have the potential to adversely impact aquatic resources, including wetlands, streams, riparian areas, and their supporting hydrology. Given the EPA's concerns regarding aquatic resources, we recommend that the USFS evaluate impacts resulting from the alternatives by providing complete data and robust analyses of potential impacts.

Existing Conditions: The Draft EIS includes a detailed discussion of the proper functioning condition (PFC) assessments that were performed on 19 stream reaches within three watersheds in the project area that are considered to be of concern due to past management-related disturbance. In addition to physical indicators observed during the PFC assessments, the USFS collected water quality data including pH, temperature, electrical conductance, and macro-invertebrate counts. However, these data do not appear in the Draft EIS. In addition to fulfilling the need for baseline information to measure future changes, such data are important for understanding the current condition of water quality in the project area. For this reason, we recommend that the USFS present the data, or at a minimum a summary of the data, in the Final EIS.

Wetlands, Springs and Seeps: Although the Draft EIS includes Design Criteria to protect wetlands, springs and seeps it does not provide any information describing the extent to which such sensitive resources are expected to be present in the project area. Despite the 100 foot setback for surface disturbing activities, indirect impacts to wetlands, such as water quality impacts, may still occur. For this reason, it is important for the public and the decision maker to understand how many wetlands, springs and seeps are present in the areas proposed for treatment under each alternative. We recommend that the Final EIS include a discussion of the presence and existing condition of such resources, including a map showing their location relative to areas proposed for treatment.

Impact of Roads on Aquatic Resources: To reduce adverse impacts to watersheds, the EPA recommends minimizing new road construction and road density, as well as locating roads to limit impacts to surface waters. The preferred alternative would necessitate 2 miles of relocated system road, 3.6 miles of new temporary road, and 5.4 miles of restored old non-system road to facilitate treatment activities. While field observations of the road system were made to identify problem areas with the potential to deliver

sediment to stream channels, it is not clear to what extent new or restored non-system roads may impact sediment loading to water resources. We recommend that the Final EIS discuss the location of planned road construction/reconstruction with respect to intermittent or perennial streams. We additionally recommend the Record of Decision include a commitment to monitor road reconstruction and new road activities to ensure that Design Criteria are performing as intended to protect water resources.

2) Air quality impacts associated with the project are a critical concern that must be fully evaluated.

It is particularly important to assess and mitigate air quality impacts associated with the Black Mesa Project given that the project area borders the Weminuche Wilderness Area (i.e., a mandatory Class I Federal area).

Existing Conditions: In addition to the example graphs provided in the Draft EIS that show particulate matter concentrations over the time period from 2000 to 2010, we recommend that the Final EIS include a summary table indicating the current background concentrations of all criteria pollutants. This will provide a more complete current air quality baseline in the project area for comparison to anticipated impacts. In addition, because visibility is a protected air quality related value (AQRV) in mandatory Class I Federal areas, we recommend that the Final EIS include a graph showing visibility trends in the Weminuche Wilderness Area over the past several years. AQRV data are readily available from the VIEWS website (<http://views.cira.colostate.edu/web/>).

Emissions Inventory: The Draft EIS discusses several project activities that could impact air quality including vehicle emissions from logging equipment, dust from travel on unpaved roads and burning of slash piles. The Draft EIS does not include information on what pollutants would be emitted, in what quantities, and how those emissions may impact air quality and AQRVs. We recommend that the Final EIS include a qualitative discussion of criteria pollutants anticipated to be emitted by project activities and how the emissions are predicted to impact air quality and AQRVs in the project area including the Weminuche Wilderness Area and town of Creede.

Mitigation: The Draft EIS indicates that dust abatement would be required on portions of FSR 520 if logging occurs during the summertime, but gives no detail on how dust abatement would be accomplished. We recommend that the Final EIS include a detailed dust control plan including control methods, frequency and/or triggers for application, and expanded to include other project area roads and logging areas which may also warrant dust abatement.

EPA's Rating and Recommendation

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified a need for additional information, data, analyses or discussion in the Final EIS in order for the EPA to

fully assess environmental impacts from the proposed project. A full description of the EPA's rating system is enclosed.

We hope that our comments regarding aquatic resources and air quality will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this Draft EIS. If we may provide further explanation of our comments, please contact me at 303-312-6925. You may also contact Molly Vaughan, lead reviewer for this project, at 303-312-6577 or vaughan.molly@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'S. J. Bohan', with a stylized flourish at the end.

SJ Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure